REMARKS

The Examiner is thanked for the thorough examination of the present application. The Office Action, however, has continued to reject all claims 1-20. In response, Applicant submits the foregoing amendments (in which claims 1, 6, and 11 are amended) and the following distinguishing remarks. Applicant submits that no new matter is added by these amendments, and Applicant respectfully requests that the rejections be reconsidered and withdrawn.

Rejection under 35 U.S.C 112, Second Paragraph

The Office Action rejected claim 6 under 35 U.S.C. § 112, second paragraph. Applicant has amended claim 6 to address and overcome this rejection. Accordingly, the rejection should be withdrawn.

Rejections under 35 U.S.C 103(a)

Claims 1-3, 8-10, 11-13, and 18-20 stand rejected under 35 U.S.C 103(a) as allegedly being obvious over Zhu et al. "Image Coding By Folding" in view of Inomata et al. (US 2004/0120517 A1).

In regard to claims 1 and 11, Zhu and Inomata do not teach or suggest what the examiner relies upon it as supposedly teaching. Zhu and Inomata fail to disclose, suggest, or teach, *inter alia*, the following feature recited by above claims of the present application:

> *dividing an original image into two image parts **according to a compression technique**, wherein one of the image parts is the base image data and the other image part is the auxiliary image data, and the base image data and the **auxiliary image data***

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> ***respectively comprise a part of image contents comprising***
> ***pixel values of the original image***; and
> ***encrypting the auxiliary image data to an auxiliary image data***
> ***cipher***.

(*Emphasis added*). Independent claims 1 and 11 patently define over the cited art for at least the reason that the cited art fails to disclose the features emphasized above.

In the Zhu reference, an image is split into two parts of equal size. The division manner of images is predefined and fixed. That is, ***each image to be processed by Zhu is forced to split into two parts of equal size***. In the present application, however, an original image is divided into two image parts, called base image data and auxiliary image data, ***based on the compression technique*** used for compressing the first image part (the base image data)*. Zhu does not disclose an image is divided into base image data and auxiliary image data **according to a compression technique.***

In addition, paragraph [0033] of Inomata states:

> "In parallel with the quantization and entropy encoding, *encryption processing for the **quantization table and the coding table** is carried out by the encryptor 20*. Obviously this encryption can be encryption of the **tables themselves**, but it is also possible to encrypt **information necessary to reconstruct the table**. For example, in the case of a JPEG encryption table, as is well known, if a table showing number of code words for each code length and coding elements arranged in order of frequency of occurrence is known, it is possible to reconstruct the coding table at the decoding side, which means that the same results can be obtained as encrypting the coding tables themselves, even if the table of number of code words and data of coding elements for order of frequency of occurrence are encrypted".

Applicant notes that, in the Inomata reference, ***the related tables and information necessary to reconstruct the tables are encrypted.*** In the present application, however, the ***auxiliary image data is encrypted.*** As described, in the present application, an original image is divided into two image parts, called base image

data and auxiliary image data. Each image part includes a part of the pixel values (image content) of the original image. That is, ***the auxiliary image data includes a part of the***

<u>pixel values (image content) of the original image.</u> It is clear that *the auxiliary image*

data in the application cannot be properly equated to the tables and information

necessary to reconstruct the tables in the Inomata reference ***<u>since the tables and</u>***

<u>information necessary to reconstruct the tables in the Inomata reference does not</u>

<u>have a part of pixel values of the original image</u>.

Since Zhu and Inomata fail to teach the claimed features above of the

invention, independent claims 1 and 11 are patentable over the cited reference. Insofar

as claims 2-10 depend from claim 1, and claims 12-20 depend from claim 11, these

claims are similarly patentable. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q.2d 1596, 1600 (Fed.

Cir. 1988).

In view of the foregoing remarks, the Applicants respectfully request the

Examiner's reconsideration of the application and the timely allowance of claims.

CONCLUSION

In view of the foregoing, it is believed that all pending claims are in proper condition

for allowance. If the Examiner believes that a telephone conference would expedite the

examination of the above-identified patent application, the Examiner is invited to call the

undersigned.

No fee is believed to be due in connection with this amendment and response to Office Action. If, however, any fee is believed to be due, you are hereby authorized to charge any such fee to deposit account No. 20-0778.

Respectfully submitted,

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